

WILDFLOWER ENERGY

LARKSPUR FACILITY, SAN DIEGO

**SPILL PREVENTION, CONTROL AND
COUNTERMEASURE (SPCC) PLAN**

Prepared by

URS Corporation
March, 2001

**SPILL PREVENTION CONTROL & COUNTERMEASURE PLAN
GENERAL INFORMATION**

Name of Facility Larkspur Energy Facility
Type of Facility Power Generating Facility
Location of Facility Otay Mesa Road
 San Diego, CA 92154
Name & Address of Owner or Operator:
 Name Wildflower Energy LP
 Address 909 Fannin, Suite 2222
 Houston, TX 77010

Designated person accountable for oil spill prevention, emergency procedures, reporting and employee training:

Signature _____

Facility has not experienced a reportable oil spill event during the twelve months prior to the effective date of 40 CFR, Part 112.

MANAGEMENT APPROVAL

This SPCC Plan has been reviewed and approved as herein described.

Signature _____
Name _____
Title _____

CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices and Section 112.7.

Printed Name of Registered Prof. Engr.

Seal

Signature of Registered Prof. Engr.

Date _____

Registration No. _____ State _____

GENERAL

This Spill Prevention, Control and Countermeasure (SPCC) plan (Plan) has been prepared in accordance with the applicable sections of 40 CFR 112. The Plan identifies procedures, methods and equipment to prevent the discharge of oil from onshore and offshore facilities into or upon the navigable waters of the United States.

This plan will be reviewed and amended, as necessary, if there is a change in facility design, construction, operation, or maintenance which materially affects the facility's potential for a discharge of oil or if the Plan fails in response to an actual release. At a minimum, this Plan will be reviewed every three years.

Wildflower Energy will own and operates the Larkspur Power Generation Facility. The facility receives refined products by tanker truck. The product is stored in above ground storage tanks surrounded by an impervious steel containment structure. The refined products are transferred into trucks at two separate loading racks.

A. SPILL EXPERIENCE (40 CFR 112.7 (a))

This facility has not experienced a reportable oil spill event during the twelve months prior to the effective date of 40 CFR, part 112 because it is a new facility.

B. POTENTIAL SPILLS (40 CFR 112.7 (b))

The reasonable potential oil spills which may occur at the facility are summarized below:

1. Spill due to Storage Tank Leak or Failure at Tank.
 - a. Direction of flow: Confined within the tank secondary steel containment structure. If the release escapes from the secondary containment area, flow would be in the immediate vicinity of the tank and onto the facility site.
 - b. Rate of flow: Will vary according to size and location of tank leak or failure.
 - c. Total quantity of oil that could be discharged: Not to exceed 220,000 gallons, the capacity of the storage tank.
2. Spill Due to Tank Overflow During Fuel Truck Off-loading Delivery.
 - a. Direction of flow: Confined within the tank secondary steel containment structure. If the release escapes from the secondary containment area, flow would be offsite into the adjacent facilities or storm drains which flow to the ocean.
 - b. Rate of flow: Not greater than 600 gallons per minute (GPM) based on maximum truck unloading pump rate.
 - c. Total quantity of oil that could be discharged: Will vary with the length of time the tank is overflowing. It is assumed the release could be identified

and the flow stopped within 2 minutes resulting in a maximum discharge of 1200 gallons.

3. Tank Truck Loading Area

Spill could occur if the loading system piping leaks or fails, if truck tank overflows, or if truck tank leaks or fails.

- a. Direction of flow: Spill will be contained within the double-wall steel containment tank within the loading area. In the unlikely event that the release escapes from the secondary containment area, flow would be towards the facility site.
- b. Rate of flow: If loading system piping parts while loading or a truck overflows, the maximum rate of flow will be 600 GPM.
- c. Total Quantity of oil which could be discharged. In the event of a catastrophic failure, total discharge will vary with length of time delivery pump is on. It is assumed the release could be identified and the flow stopped within 5 minutes resulting in a maximum discharge of 3,000 gallons.

C. CONTAINMENT AND DIVERSIONARY STRUCTURES (40 CFR 112.7 (c))

The following secondary containment and diversionary structures are provided to prevent oil discharges from reaching a navigable water course:

1. Tank: Steel containment structure around perimeter of tank forms a sufficiently impervious impounding basin to contain a spill of the entire contents of the tank which contains 220,000 gallons plus 10% of the capacity of the tank.
2. Tank Truck Loading Area: Asphalt concrete curb around perimeter of loading area is designed to contain the largest single truck compartment.
3. Former Customer Loading Area: Asphalt concrete curb around perimeter of loading rack is designed to contain the contents of the largest single truck tank compartment.
4. BFO Loading Rack: Concrete curbs and asphalt concrete berms around perimeter of loading rack are designed to contain the contents of the largest single truck tank compartment.

D. DEMONSTRATION OF IMPRACTICABILITY (40 CFR 112.7 (d))

All storage tanks and loading areas are provided with secondary containment as described above. There is also an oil-water separator on-site. Some pipelines, valves, manifolds and related transfer equipment are located outside secondary containment areas. The facility has an oil spill contingency plan in the form of an "Oil Spill Response Plan" (OSRP) prepared in accordance with the requirements of

the Oil Pollution Act of 1990 (OPA 90). In the event of a release outside the containment areas, sections of the OSRP plan will be referenced, as appropriate.

E. ADDITIONAL REQUIREMENTS (40 CFR 112.7 (e))

(1) Facility Drainage:

- (a) Rainwater within the Tank Farm Impoundment is only allowed to percolate into the ground. A drainage record is kept of each inspection and release (See Attachment #3).

Tank Truck Loading Area, BFO Loading Rack and Customer Loading Area: When required, rainwater within the impounded tank and loading area is released through manually operated gate valves which are normally closed and locked (flapper-type valves are not used). Before opening the valves, the impounded water is inspected to ensure compliance with 40 CFR Part 110 and applicable water quality standards. A responsible operator monitors the drainage and closes and locks the valves after drainage is completed. A drainage record is kept of each inspection and release (See Attachment #3).

- (b) Facility drainage from most undiked areas is towards the site; however, some facility drainage from undiked areas will be offsite into the adjacent street.
- (c) There are no lift stations used to pump storm water drainage.

(2) Onshore Bulk Storage Tanks

- (i) All Bulk storage tanks are constructed of carbon steel in accordance with API or Underwriters Laboratories Specifications. Tank materials and construction are compatible with stored products at storage temperatures and pressures.
- (ii) Tank: Steel impounding walls, sufficiently impervious to contain a spill, provide secondary containment. The impounding basin will contain the entire contents of the tank plus 10% of the capacity of the largest tank.
- (iii) There is no drainage of rainwater from the area around the storage tank.
- (iv) There are 3 underground storage tanks at this facility. A gas compressor drainage tank, oil-water separator tank, and wash-water drainage tank. All have secondary containment. A closed valve can be opened to siphon the contents of the tanks if necessary.
- (v) There are no partially buried tanks.
- (vi) Tanks are frequently observed by personnel during normal duties. Any sign of leakage or deterioration is reported to the Facilitytendent. A formal inspection of the tanks is performed annually and a record of inspections kept (see Attachment #6).
- (vii) There are no internal heating coils at this facility.
- (viii) Tanks are gauged regularly by personnel to check product height.

All tanks receiving products are equipped with high liquid level alarms with a level detection and warning system located in the Operations Center. A high level alarm is activated when the product level reaches a predetermined height. In an emergency, on-site personnel can contact other personnel by radio or telephone to stop pumping. The alarms are physically tested by manual inspection.

- (ix) Not applicable. (Effluents are not discharged to navigable waters).
- (x) Visible oil leaks from tank seams, gaskets, rivets and bolts sufficiently large to cause the accumulation of oil in diked areas are promptly corrected.
- (xi) Not applicable. (Mobile/Portable tanks are not used).

(3) Facility Transfer

- (i) To minimize corrosion, buried piping is either wrapped or coated and above ground piping is painted. If a section of buried line becomes exposed, it is carefully examined. If corrosion damage is found, additional examination and corrective action is taken.
- (ii) Piping not in service is blank-flanged or otherwise secured to prevent

accidental oil spills. The lines are marked as to their contents.

- (iii) Pipe supports are properly designed to minimize abrasion and corrosion and allow for contraction and expansion.
- (iv) Above ground valves and pipelines are examined annually and a record is kept of the inspection (see Attachment #4).
- (v) Warnings signs are posted, where appropriate, to keep vehicular traffic from above ground piping.

(4) Tank Truck Loading Area

- (i) Tank truck loading procedures meet the minimum requirements and regulations established by the Department of Transportation.
- (ii) The loading rack containment system is designed to hold the maximum capacity of any single compartment of a tank truck using the particular loading rack.
- (iii) Drivers are instructed on procedures for properly using the loading area.
- (iv) Prior to filling and departure, the lower most drains and all outlets are closely examined for leakage, and if necessary, repaired to prevent liquid leakage while in transit.

(5) Not Applicable. (Applies to "Oil Production Facilities").

(6) Not Applicable. (Applies to "Oil Drilling and Workover Facilities").

(7) Not Applicable. (Applies to "Oil Drilling, Production, and Workover Facilities").

(8) Inspection and Records

The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached.

- Oil Spill History - See Attachment #1.
- Three Year Plan Review - See Attachment #2.
- Impounding Drainage Records - See Attachment #3.
- Annual Inspection of Pipelines - See Attachment #4.
- Plot Plan - See Attachment #5.
- Record of Tank Tests and Inspections - See Attachment #6.
- Spill Prevention Briefing - See Attachment #7.

These records of inspections are maintained for a period of 3 years.

(9) Security

- (i) This facility is fully fenced and entrance gates are locked when the plant is unattended.
- (ii) Valves which permit direct outward flow of a tank's contents are locked closed when in non-operating status.
- (iii) Starter controls on all oil pumps in non-operating or standby status are located at a site accessible only to authorized personnel.
- (iv) Piping and loading connections which are not in service are capped, blank-flanged or otherwise secured to prevent oil spills.
- (v) The Facility is sufficiently illuminated so that discharges, releases or acts of vandalism can be observed during hours of darkness.

(10) Personnel Training

- (i) Personnel are properly instructed in the operation and maintenance of equipment to prevent oil discharges and applicable pollution control laws, rules and regulations.
- (ii) The person responsible for spill prevention at this facility is identified on the signature page of this Plan.
- (iii) Scheduled spill prevention training for the operating personnel is conducted at least annually to assure adequate understanding of the SPCC Plan. (See Attachment #7).

TABLE 1
TANK POTENTIAL SOURCES OF RELEASE
WILDFLOWER ENERGY: LARKSPUR FACILITY

{PRIVATE }TANK NUMBER	SUBSTANCE STORED	MAXIMUM CAPACITY (GALLONS)	TANK TYPE/YEAR	MAXIMUM INFLOW (GPM)	MAXIMUM OUTFLOW (GPM)	SECONDARY CONTAINMENT
-	Diesel No. 2	220,000	Steel/2001	600	-	Steel structure

**SPCC PLAN ATTACHMENT #1
OIL SPILL HISTORY**

NAME OF FACILITY: LARKSPUR

1. Date: _____ Volume of spill: _____ Cause
of spill: _____

Corrective action: _____

Steps for preventing recurrence: _____

2. Date: _____ Volume of spill: _____
Cause of spill: _____

Corrective action: _____

Steps for preventing recurrence: _____

3. Date: _____ Volume of spill: _____ Cause
of spill: _____

Corrective action: _____

Steps for preventing recurrence: _____

**SPCC PLAN ATTACHMENT #2
THREE YEAR PLAN REVIEW**

This SPCC plan must be reviewed every 3 years from the date it was implemented and one or the other of the following completed:

Plan Review - No Amendment Necessary

I certify that I have made a complete Review and evaluation of this SPCC Plan and have found no amendment to this Plan necessary.

Owner or Operator _____ Signature _____
_____ Date _____

Plan Review - Amendment Necessary

I certify that I have made a complete review and evaluation of the SPCC Plan and have found that an amendment is necessary.

Describe amendment:

Posting

A copy of this plan is permanently maintained at this facility.

CERTIFICATION

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices and Section 112.7.

Printed Name of Registered Prof. Engr.

Seal

Signature of Registered Prof. Engr.

Date _____

Registration No. _____ State _____

Name of Facility _____ Operator _____

**SPCC PLAN ATTACHMENT #3
IMPOUNDING DRAINAGE - RECORDS**

NAME OF FACILITY: _____ PERSON IN
CHARGE: _____

It is the responsibility of the Senior Terminal Operator to assure that all drainage of rainwater runoff from the impounding basin is done under his strict supervision.

Normally, water in the diked area is left to evaporate. Should drainage be necessary, it must be determined that the water to be released does not have any oil sheen or other signs of contamination as defined in 40 CFR part 110 and that the water complies with all applicable local or state regulations.

If an oil sheen or other evidence of contamination is found, the water must be cleaned before discharging. The entire release must be under constant supervision.

Drainage records are to be kept in the facility and on file for three years.

DRAINAGE RECORD

{PRIVATE }DATE OF DRAINAGE	DATE OF BYPASSING		DATE OF INSPECTION	OIL REMOVAL	SUPERVISOR'S OR OPERATOR'S SIGNATURE
	OPEN	CLOSED			

**SPCC PLAN ATTACHMENT #4
ANNUAL INSPECTION OF PIPELINES**

NAME OF FACILITY: _____ DATE: _____
PERSON IN CHARGE: _____

LOADING RACKS

COMMENTS

_____ hoses before driving away from rack are posted.	1. Signs reminding drivers to
_____ impounding berm discharge valves (if open) before loading/unloading are posted.	2. Signs reminding truck drive
_____ good operating condition and without leaks.	3. Product loading arms and
_____ equipment is operational.	4. Truck metering and overflc
_____ good condition.	5. Slabs and berms around lc
_____ operating condition and sump clean and free of oil and debris.	6. Impounding berm discharg
_____ unattended.	7. Entrance gates are locked
_____ in good condition.	8. Security fencing around th
_____ been inspected (including flange joints, valve glands & bodies, catch pans, pipelines supports, locking of valves, and metal surfaces.	9. All above ground valves &

_____ This form is to be kept with the SPCC Plan for three years after the date of inspection.

SPCC PLAN ATTACHMENT #5
PLOT PLAN

Name of Facility Larkspur
Operator Wildflower Energy

[illegible]

RECORD OF TANK TESTS AND INSPECTIONS - ATTACHMENT #6

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TANK YARD IMPOUNDING BASINS

COMMENTS

<p>storage tanks have been visually inspected for corrosion, leaks or damages (including seams, rivets, bolts, gaskets, nozzle connections, valves, connected pipelines and tank foundations).</p>	1.	All bulk
<p>above ground valves & pipelines have been inspected (including flange joints, valve glands & bodies, catch pans, pipelines supports, locking of valves, and metal surfaces.</p>	2.	All
<p>manual tank valves are secured closed except when in use.</p>	3.	All
<p>automatic tank valves are in good working order and are normally closed except when in use.</p>	4.	All
<p>5. Storage tank overfill protection systems are in good working order.</p>	6.	
<p>Security fencing around the facility is in good condition.</p>		
<p>7. Impounding walls and berm in tank yard are in good condition and without any breaks.</p>		
<p>outlet valve is in good operating condition and securely locked closed when not in use.</p>	8.	The

This form is to be kept with the SPCC Plan for three years after the date of inspection.

**SPCC PLAN ATTACHMENT #7
SPILL PREVENTION BRIEFING**

Location: _____

Date of Briefing: _____

Briefing Conducted By: _____

The following items were discussed at the meeting:

(Check items discussed)

_____	SPCC Plan
_____	Applicable pollution control laws, rules and regulations
_____	Spill events or failures at this or other facilities
_____	Operation and maintenance of equipment to prevent oil spills
_____	Spill reporting procedures
_____	Other _____

Plant operating personnel in attendance:

1. _____	11 _____
2. _____	12 _____
3. _____	13 _____
4. _____	14 _____
5. _____	15 _____
6. _____	16 _____
7. _____	17 _____
8. _____	18 _____
9. _____	19 _____
10. _____	20 _____

The briefing report should be kept with the SPCC Plan for three years.